REMARKS

The rejections presented in the Office Action dated August 30, 2004 have been considered. Claims 1-13 remain pending in the application. Reconsideration and allowance of the application are respectfully requested.

The Office Action does not establish that claims 1-8 and 10-13 are anticipated under 35 USC §102(a) by US patent number 6,643,701 to Aziz et al. (hereinafter "Aziz"). The rejection is respectfully traversed because the Office action fails to show that all limitations of the claims are taught by Aziz.

Claim 1 includes limitations of generating at the gateway module respective first session identifiers upon receipt of initial requests from the mobile communication devices at the gateway module and transmitting the first session identifiers to the application program; associating the first session identifiers with corresponding second session identifiers from the application program at the gateway module; and in response to subsequent communications from the mobile devices to the application program, transmitting from the gateway module to the application program the second session identifiers that are associated with the first session identifiers of the mobile devices of the subsequent communications.

The Office Action generally cites various sections of Aziz without calling out specific elements as corresponding to specific claim limitations. Therefore, the following discussion assumes that the Examiner intended various elements of Aziz as described below. If the assumptions are incorrect, an explanation of the intended correspondences is respectfully requested. It is assumed that the Examiner understands Aziz's security keys as corresponding to the claimed first and second session identifiers. However, if this is the intended correspondence, then the Office Action is clearly mistaken in alleging that Aziz teaches the claim limitations. Even though this correspondence is assumed, it should be understood that Applicants do not accede to the interpretation that Aziz's security keys teach or suggest the claimed first and second session identifiers. Those skilled in the art understand that session identifiers and security keys are used for different purposes, and security keys are not suggestive of session identifiers. Thus, in addition to failing to show that Aziz teaches the various claim limitations of and related to the use of session identifiers as explained below, the Office Action fails to show any teaching of session identifiers.

The claim limitations clearly set forth that in response to subsequent communications (subsequent to associating the first and second session identifiers) from mobile devices to the application program, the second session identifiers associated with the first session identifiers

are transmitted from the gateway module to the application program. As set forth earlier in the claim, the second session identifiers are from the application program. Thus, the gateway module transmits back to the application program the second session identifiers that the application program established for the first session identifiers provided by the gateway module for the mobile devices. None of the cited sections of Aziz teach these and the related limitations.

Aziz's server provides a relay with its security certificate and public/private key pair, and Aziz's relay and server create an end-to-end security link using a handshaking session (col. 8, ll. 15-20). Upon receiving a client request at the relay, the client and the relay begin a handshaking session. The relay responds to the client's handshaking request using the server's certificate and public/private key pair (col. 8, ll. 33-41). Once the links between client and the relay and between the relay and the server are established, information is transferred between the client and the server through the relay (col. 8, ll. 58-62). There is no apparent description of, or apparent need for Aziz's relay to transfer the security certificate and public/private key pair, as was provided by the server, back to the server. Thus, the Office Action does not show that Aziz teaches the limitations of and related to "transmitting from the gateway module to the application program the second session identifiers that are associated with the first session identifiers of the mobile devices of the subsequent communications."

If the rejection is maintained, an explanation of the specific elements of Aziz thought to correspond to the claim limitations is respectfully requested. Otherwise, the rejection should be withdrawn for failing to show that Aziz teaches all the claim limitations.

Claim 2 depends from claim 1 and is not shown to be anticipated for at least the reasons set forth above.

Claim 3 depends from claim 2 and includes further limitations of generating at the authentication module respective authentication identifiers for the first session identifiers and associating the authentication identifiers with corresponding first session identifiers. The limitations clearly specify both authentication identifiers and session identifiers, and the Office Action has only shown that Aziz teaches certificate and public/private key pairs. Neither of Aziz's certificate nor the public/private key pairs teach session identifiers. Therefore, claim 3 is not shown to be anticipated by Aziz.

Claim 4 is an apparatus claim that includes function limitations similar to those described above for claim 1. Therefore, claim 4 is not shown to be anticipated by Aziz.

Claim 5 is a method claim that includes the limitations of claim 1, and the Office Action does not show that Aziz anticipates claim 5 for at least the reasons set forth above.

Claim 6 includes further limitations of receiving checkout requests from the wireless communication devices at the gateway module and transferring the checkout requests to a wallet module that manages user authentication; when a user at a wireless communications device has logged-in to the wallet module, transmitting payment options from the wallet module to the wireless communications device in response to a checkout request from the wireless communications device. It is respectfully submitted that the cited sections of Aziz make no apparent reference to either checkout requests or to transmitting payment options. Therefore, the Office Action does not show that claim 6 is anticipated. If the rejection is maintained, further explanation is respectfully requested as to the specific elements of Aziz that are thought to correspond to checkout and payment options.

Claim 7 includes limitations of generating at the wallet module respective wallet session identifiers for the wireless session identifiers and associating the wallet session identifiers with corresponding wireless session identifiers in a wallet session identifier table. The Office Action has not cited any teaching of Aziz as showing both session identifiers and wallet session identifiers. In rejecting claim 7, the Office Action relies on Aziz's teachings of a certificate and public/private key pair, which are the same teachings used to reject claim 1. Thus, the Office Action has not shown any teaching of a session identifier, nor has the Office Action shown any teaching of the additional wallet identifier.

Claim 8 includes further limitations of and related to processing of payment requests. As explained above in regards to claim 6, the Office Action has not cited any teaching of Aziz that alludes to payment requests. Therefore, the Office Action fails to show that claim 8 is anticipated.

Claims 10 and 11 are not shown to be anticipated for at least the reasons set forth above.

Claim 12 includes limitations similar to those of claim 2, and the Office Action does not show that claim 12 is anticipated for at least the reasons set forth above for claim 2.

Claim 13 includes limitations similar to those of claim 3, and the Office Action does not show that claim 13 is anticipated for at least the reasons set forth above for claim 3.

The Office Action fails to establish that claim 9 is unpatentable under 35 USC §103(a) over Aziz. The rejection is respectfully traversed because the Office Action does not show

that Aziz suggests all the limitations of the base claims, does not provide a sufficient motivation to modify the teachings of Aziz, and does not show that the proposed modification could be made with a reasonable expectation of success.
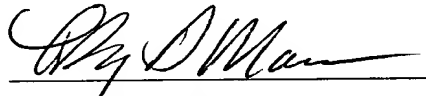
Claim 9 depends from claim 8 and includes limitations of clearing inactive entries from the wallet session identifier table. As explained above, the Office Action does not show that Aziz teaches the limitations of claim 8, the limitations of the base claim from which claim 8 depends, or the limitations of any of the intervening claims. Thus, the Office Action does not show that all the limitations of claim 9 are shown or suggested.

The Examiner takes official notice that erasing entries from a table is well known. However, the Examiner fails to acknowledge the additional limitations of the particular table from which the entries are cleared. Specifically, the Examiner fails to provide any evidence of a suggestion of a table resembling a wallet session identifier table. Applicants claim an operation on a wallet session identifier table, not merely clearing entries from a table. Thus, the Office Action fails to provide evidence that the limitations of claim 9 are suggested by the prior art. For at least the reasons set forth above, the Office Action does not establish a *prima facie* case of obviousness.

Withdrawal of the rejections and reconsideration of the claims are respectfully requested in view of the remarks set forth above.

Respectfully submitted,

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